

Exhibit 16

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:)
) Case No.
NATIONAL RIFLE ASSOCIATION) 21-30085-hdh-11
OF AMERICA AND SEA GIRT, LLC)
) Chapter 11
Debtors.)

VIDEOTAPED ORAL DEPOSITION OF
NATIONAL RIFLE ASSOCIATION OF AMERICA
BY AND THROUGH ITS CORPORATE REPRESENTATIVE
JOHN FRAZER
MARCH 15, 2021
VOLUME 1
CONFIDENTIAL PURSUANT TO PROPOSED PROTECTIVE ORDER
(Reported Remotely)

1 Mr. Powell, correct? 09:21:32

2 A. Yes. 09:21:33

3 Q. And did Mr. Powell contest any 09:21:36

4 expenditures that were listed on the spreadsheet? 09:21:38

5 A. He did. 09:21:40

6 Q. All right. And did you-all come to a 09:21:41

7 determination of which expenses were proper and 09:21:44

8 which ones were improper? 09:21:47

9 A. Well, the NRA and Mr. Powell came to 09:21:49

10 different determinations of which expenses were 09:21:52

11 proper and improper, which is why he -- he short 09:21:55

12 paid the demand. 09:21:59

13 Q. Were there any expenses which were 09:22:02

14 considered to be included in the excess benefit 09:22:04

15 transactions but not included? 09:22:06

16 MR. CICILIANO (VIA ZOOM): Objection; 09:22:10

17 vague, form. 09:22:13

18 A. Yes, there were. 09:22:16

19 Q. And what were those expenses? 09:22:17

20 A. I think it include -- well, there were -- 09:22:22

21 there were a few. There were his -- there were 09:22:25

22 his -- his cellular phone charges where we demanded 09:22:33

23 information about -- you know, more detailed 09:22:37

24 information about his cellular billing. I don't 09:22:40

25 think we demanded repayment of those, but we also 09:22:43

1 couldn't get enough information to determine that 09:22:46

2 they were necessarily improper. 09:22:49

3 And I think we -- I think there was some 09:22:50

4 unclarity about the terms of his -- some of his 09:22:53

5 housing and relocation expenses and whether they 09:22:59

6 properly should have been covered or not. 09:23:02

7 So I think we left -- I think we left some 09:23:04

8 things out where we were uncertain about -- 09:23:06

9 uncertain about the justice of the demand. 09:23:09

10 Q. The justice -- you had concerns about the 09:23:13

11 justice of the demand. 09:23:16

12 What does -- and what does that mean? 09:23:18

13 A. Just whether the -- whether the evidence 09:23:19

14 was strong enough that the expenditures were 09:23:20

15 improper. 09:23:23

16 Q. Okay. So who participated in that 09:23:23

17 negotiation with Mr. Powell about the justice of the 09:23:26

18 particular claims? 09:23:31

19 A. Well -- well, just to be clear, there were 09:23:33

20 a couple of -- there were -- there were multiple 09:23:35

21 discussions with Mr. Powell's -- who was represented 09:23:38

22 by counsel through -- throughout. There were 09:23:43

23 multiple discussions with counsel. But the 09:23:45

24 discussions were by me and Ms. Rogers. 09:23:46

25 Q. Did the NRA list on its bankruptcy 09:23:52